

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT NEW YORK**

ADVANCED ACCESS CONTENT SYSTEM
LICENSING ADMINISTRATOR, LLC,

Plaintiff,

v.

LANNY SHEN d/b/a DVDFAB AND
FENGTAO SOFTWARE INC., SUNREG
TECHNOLOGIES LTD. d/b/a DVDFAB AND
FENGTAO SOFTWARE INC., FENG TAO
d/b/a DVDFAB AND FENGTAO SOFTWARE
INC., SHEN XINLAN d/b/a AUDIO-DVD
CREATOR, and JOHN DOE, JANE DOE and/or
XYZ COMPANY d/b/a DVDFAB, RIPPERBLU-
RAY.COM, DVDFABB.COM and
DVDFFAB.COM,

Defendants.

NO. 14-cv-1112 (VSB)

**DECLARATION OF GEORGE P.
WUKOSON IN OPPOSITION TO
DEFENDANT FENG TAO d/b/a
DVDFAB AND FENGTAO
SOFTWARE INC.'s MOTION TO
AMEND INJUNCTION PURSUANT
TO RULE 59(e)**

GEORGE P. WUKOSON, under penalty of perjury, declares and says:


1. I am an attorney licensed to practice law in the State of New York and admitted to the bars of the Southern and Eastern Districts of New York. I work associated with the law firm of Davis Wright Tremaine LLP ("DWT"), counsel to the Plaintiff Advanced Access Content System Licensing Administrator, LLC ("AACS LA" or "Plaintiff").

2. I submit this declaration on behalf of AACS LA's in opposition to defendant Feng Tao d/b/a DVDFab and Fengtao Software Inc.'s ("Feng Tao" or "Defendant") motion to vacate the entry of default against the defendants in this action ("Defendants").

3. I have knowledge of the facts set forth below based on my personal knowledge and the records of DWT.

4. On March 26, 2014, Nancy J. Mertz of Schoeman Updike Kaufman Stern & Ascher LLP as attorney for Feng Tao contacted G. Roxanne Elings of DWT as attorney for AACS LA. This was the first contact regarding this action by an attorney (or any representative other than the "Frank" discussed in Paragraph 5 of my declaration of April 21, 2014) for any of the Defendants with AACS LA or any of its representatives.

Executed this 11th day of July 2014 in New York, New York.


George P. Wukoson